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December 17, 2021

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Hayes, et al., No. 20 Cr. 500 (JGK)**

Dear Judge Koeltl:

Pursuant to the Court's order of May 11, 2021, ECF No. 71, the government and the Defendants will be submitting their reply memoranda of law in further support of their motions *in limine* to the Court on December 20, 2021. The full set of papers will be delivered to Chambers in both hard copy and electronic form.

Having conferred with the government pursuant to the Court's Individual Practices Rule VI.A.2, the parties respectfully seek leave from the Court to file these reply memoranda under seal at the present time because they include materials the government has designated "Confidential" or "Sensitive" pursuant to the protective orders that have been entered in this case, ECF Nos. 23, 41, 55, and that the moving parties contend are irrelevant, prejudicial, and/or otherwise inadmissible. The parties will confer on proposed redactions.

We are available at the Court's convenience to discuss any questions. Thank you.

Respectfully submitted,

/s/ Douglas K. Yatter
Douglas K. Yatter
Benjamin Naftalis
of LATHAM & WATKINS LLP

LATHAM & WATKINS^{LLP}

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